


APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 6/16/2020

June 3rd, 2020

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court, Southern District New York,
40 Foley Square, Room 415,
New York, New York 10007.

Defendants shall have until June 30, 2020 to retain counsel and comply with my prior discovery orders. If Defendants fail to comply with this order, then Plaintiff shall renew its motion and default judgment will be entered, as will an order of reference to the Magistrate Judge for an inquest on damages and fees. The Clerk is directed to mail a copy of this order to the pro se Defendant, and is further directed to terminate the open motion at Document 57.

Re: Dubai Equine Hospital V. Equine Imaging, LLC et, al., No. 18-cv-6925

Dear Judge Broderick:

I am the defendant of the above case, George Papaioannou and as of today the 3rd of June I have received a number of documents from the representative of Plaintiff Dubai Equine Hospital.

We respectfully request some more time to complete the list of documents and information that the Plaintiff representative requested.

There are three very serious reasons that have cause significant delays in the production of those documents and cause inevitable delays in our part:

1. On December the 20th 2019 our office location was flooded and resulted in a loss of significant amount of our archived system in New York. This system had necessary copies of the documents requested by the Plaintiff's representative. I can provide the full official insurance report of these damages. I am engaged to recollect these document but it is a very time consuming process.
2. As of earlier last month we separated from the legal representation of Germano & Cahill, P.C. We have been diligently trying to find new counsel representation and we are in the process of establishing this in the immediate future. It would, however, take some additional time to bring the new legal team up to date with the case.
3. As of March 2020 we were saddened and shocked to have found out the decease of our chief operational manager, Mr. Fernando Viveros. He was a critical member of our company during the period of the events discussed in this case and a key witness. He was also an archiver of many of those documents required cross-checking for the upcoming deposition.

We, therefore, and given the current difficulties with the curfew and COVID-19 restrictions, respectfully request some more time to complete our collection of materials and present to the Plaintiff's representative.

Respectfully Submitted,
George Papaioannou
169 Middle Neck Rd
Port Washington, New York, 11050
414 326 0665

